

MELINDA HAAG (CABN 132612)  
United States Attorney

DAVID R. CALLAWAY (CABN 121782)  
Chief, Criminal Division

RITA F. LIN (CABN 236220)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-6511  
FAX: (415) 436-7234  
Rita.Lin@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 97-267 MMC
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	REGARDING AMENDED BRIEFING SCHEDULE
v.	)	FOR DEFENDANT'S SPEEDY TRIAL MOTION
	)	
KAMAL M. KADRI,	)	
	)	
Defendant.	)	
	)	

The defendant, KAMAL M. KADRI, represented by Alexandra McClure, and the government, represented by Rita F. Lin, Assistant United States Attorney, are currently scheduled to appear before the Court on October 21, 2015, for a hearing on a motion concerning his speedy trial rights. Currently, the defendant is scheduled to file that motion on September 16, 2015, with the government's opposition brief due on September 30, 2015, and the defendant's reply due on October 9, 2015.

The parties respectfully request to continue the briefing dates on the defendant's speedy trial motion by two days. On August 25, 2015, the defendant requested additional discovery from the government in connection with that motion. The government responded with most, but not all, of the discovery requested on September 11, 2015. In response, today, the defendant provided some additional

1 detail regarding the discovery sought. In an attempt to keep the current hearing date, the government  
 2 will make its best efforts to produce the remaining discovery in the next day or two. To allow the  
 3 defendant time to evaluate those materials, the parties stipulate and jointly request that the briefing dates  
 4 be continued by two days such that the defendant's speedy trial motion will be due on September 18,  
 5 2015, that the government's opposition will be due on October 2, 2015, and that the defendant's reply  
 6 brief will be due on October 9, 2015.

7  
 8 Dated: September 14, 2015

Respectfully submitted,

9 MELINDA HAAG  
 10 United States Attorney

11 By: /s/ Rita F. Lin  
 12 RITA F. LIN  
 13 Assistant United States Attorney

14  
 15 By: /s/ Alexandra McClure  
 16 ALEXANDRA MCCLURE  
 17 Counsel for Defendant Kamal M. Kadri

18 **[PROPOSED] ORDER**

19 IT IS HEREBY ORDERED that the defendant's speedy trial motion will be due on September  
 20 18, 2015, that the government's opposition will be due on October 2, 2015, and that the defendant's  
 21 reply brief will be due on October 9, 2015. The motion <sup>is hereby rescheduled</sup> ~~will remain scheduled~~ for hearing on October  
 22 21, 2015 at 2:15 p.m. Contrary to the above stipulation, the filing deadline for the reply was  
 23 October 7, 2015, not October 9, 2015. (See Order, filed Sept. 2, 2015.)

24 DATED: September 15, 2015

25   
 26 HONORABLE MAXINE M. CHESNEY  
 27 United States District Court Judge  
 28